

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FILED

AUG 13 2015


Clerk

UNITED STATES OF AMERICA, CR. 15-40075
Plaintiff, SUPERSEDING INFORMATION
vs. USE OF INTERSTATE FACILITIES TO
BENJAMIN LYLE IVERSON, TRANSMIT INFORMATION ABOUT A
Defendant. MINOR
18 U.S.C. § 2425

The Assistant United States Attorney charges and informs the Court:

On or about April 11, 2015, in the District of South Dakota, the defendant, Benjamin Lyle Iverson, using a facility and means of interstate commerce, that is, the internet on his cell phone, knowingly initiated and attempted to initiate the transmission of the name and electronic mail address of another individual knowing that other individual had not attained the age of 16 years, with the intent to entice, encourage, offer, or solicit any person to engage in any sexual activity for which any person can be charged with a criminal offense, including, but not limited to criminal prosecution for

solicitation of a minor, in violation of South Dakota Codified Laws 22-24A-5, all
in violation of 18 U.S.C. § 2425.

Dated this 13^r day of August, 2015.

RANDOLPH J. SEILER
ACTING UNITED STATES ATTORNEY



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